

J Christopher Jorgensen, Esq.
Nevada Bar No. 5382
Matthew R. Tsai, Esq.
Nevada Bar No. 14290
LEWIS ROCA ROTHGERBER CHRISTIE LLP
3993 Howard Hughes Parkway, Suite 600
Las Vegas, Nevada 89169
Tel: (702) 949-8200
Email: cjorgensen@lewisroca.com
Email: mtsai@lewisroca.com

Attorney for Defendant Hyundai Capital America

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JAJUAN KARLAN JACKSON,

Plaintiff,

VS.

HYUNDAI CAPITAL AMERICA, INC.,
a Foreign Corporation,

Defendant.

Case No. 2:20-cv-02295-APG-DJA

**DEFENDANT HYUNDAI CAPITAL
AMERICA'S UNOPPOSED MOTION
TO EXTEND DEADLINE TO
RESPOND TO COMPLAINT**

(FIRST REQUEST)

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), Hyundai Capital America (“HCA”), through its attorneys, respectfully requests that the Court extend the deadline in which HCA has to answer or otherwise plead to Plaintiff’s Complaint, by 21 days, through and until May 10, 2021. In support of its Motion, HCA states as follows:

1. Plaintiff's Waiver of Service of the Summons was filed on February 1, 2021. (ECF No. 1).

2. After executing a waiver of service, HCA's deadline to respond to the Plaintiff's Complaint is currently April 19, 2021.

3. HCA now respectfully requests that the Court extend HCA's deadline to respond to the Complaint by 21 days through and including May 10, 2021.

4. This is HCA's first request for an extension; this request is brought in good faith and not made to unnecessarily delay discovery or the proceedings in this matter.

5. No party will be prejudiced by the requested extension nor, respectfully, will the extension unduly burden the Court.

6. Counsel for HCA sought concurrence to this motion from counsel for Plaintiff and concurrence was obtained to extend the deadline to May 10, 2021. Counsel for Plaintiff has agreed to extend the response deadline by 21 days.

WHEREFORE Defendant HCA, respectfully requests that the Court grant its Unopposed Motion for Extension of Time to File a Responsive Pleading, extending its deadline to answer or otherwise plead to Plaintiff's Complaint through and until May 10, 2021, and award such other relief the Court deems just and proper.

DATED this 19th day of April, 2021.

LEWIS ROCA ROTHGERBER CHRISTIE LLP

/s/ Matthew Tsai
J Christopher Jorgensen, Esq.
Nevada Bar No. 5382
Matthew R. Tsai, Esq.
Nevada Bar No. 14290
3993 Howard Hughes Parkway, Suite 600
Las Vegas, Nevada 89169

Attorneys for Defendant Hyundai Capital America

ORDER

IT IS SO ORDERED

11-1350 ORDERED

DANIEL J. ALBRECHTS

DANIEL J. ALBRECHTS
UNITED STATES MAGISTRATE JUDGE

DATED: April 19, 2021

CERTIFICATE OF SERVICE

Pursuant to Nev.R.Civ. Rule 5(b) and E.D.C.R. 8.05, I caused a true and correct copy of the foregoing *Defendant Hyundai Capital America's Unopposed Motion to Extend Deadline to Respond to Complaint* to be filed and served via the Court's EFiling system, which will send an electronic copy to all interested parties. The date and time of the electronic service is in place of the date and place of deposit in the mail.

DATED this 19th day of April, 2021.

/s/ Annette Jaramillo
An employee of Lewis Roca

3993 Howard Hughes Parkway, Suite 600
Las Vegas, NV 89169

LEWIS ROCA